

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
ex rel. TONY HILLARD,)	
)	
Petitioner,)	
)	
vs.)	No. 08 C 1775
)	
KEITH ANGLIN, Warden,)	The Honorable
Danville Correctional Center,)	Robert W. Gettleman,
)	Judge Presiding.
Respondent.)	

MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE REPLY TO
ANSWER UNTIL SEPTEMBER 29, 2008

Now comes petitioner, Tony Hillard, by his attorney, Frederick F. Cohn, and moves for extension of time within which to file Reply to Answer until September 29, 2008.

In support hereof it is asserted:

1. Attorney Frederick F. Cohn is representing petitioner pro bono.

2. Assistant Attorney General, Charles Redfern, has no objection to the grant of this Motion.

3. Petitioner's Reply is due on August 7, 2008.

4. Counsel requests this extension because of the following:

(a) Counsel has prepared and filed the following: a Petition for Rehearing in People v. Morales, 1-06-0671, in the Illinois Appellate Court, First District; a Reply Brief in People v. Kraybill, No. 1-06-0872, in the Illinois Appellate Court, First District; a Brief in People v. Armfield and Randall, Nos. 1-07-2902 and 1-07-2903 (consolidated) in the Illinois Appellate Court, First District; a Brief in People v.

Moore, No. 08-0228, in the Illinois Appellate Court, First District; a Reply Brief in United States v. Navar, No. 06-2380, in the United States Court of Appeals, Seventh Circuit; a Brief in People v. Spears, No. 1-06-3526, in the Illinois Appellate Court, First District; an Amended Post-Conviction Petition in People v. Hubbard, No. 05-CF-84, in the Circuit Court of the Fifteenth Judicial Circuit, Jo Daviess County, Illinois; Motions and Memoranda in United States v. Orr, No. 3-08-CR-16, in the United States District Court for the Southern District of Iowa.

(b) Counsel has been working on a Brief in United States v. Ali, No. 06-3951, in the United States Court of Appeals, Seventh Circuit.

(c) Counsel has also made two trips to Dubuque, Iowa to see Mr. Orr who is being held by federal officials in the Dubuque County Jail.

(d) On August 11, 2008, counsel begins a trial in United States v. Orr, No. 3-08-CR-16, in the United States District Court for the Southern District of Iowa in Davenport, Iowa which should last about two weeks.

WHEREFORE, it is prayed as above.

Respectfully submitted,

s/ Frederick F. Cohn
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2008, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the CM/ECF system which will send notification of such filing to the following:

Charles Redfern
Assistant Attorney General
100 W. Randolph Street
12th Floor
Chicago, Illinois 60601

s/ Frederick F. Cohn
FREDERICK F. COHN